

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
JOSHUA MAST, et al.,)	
)	Case No. 3:22-cv-00049-NKM
<i>Defendants,</i>)	
)	
and)	
)	
UNITED STATES SECRETARY OF)	
STATE ANTONY BLINKEN, et al.,)	
)	
<i>Nominal Defendants.</i>)	
_____)	

**MOTION FOR *PRO HAC VICE* ADMISSION OF
MICHAEL R. HOERNLEIN**

Pursuant to Rule 6(d) of the Court’s Local Civil Rules, Thomas W. Davison, counsel for Defendant Kimberly Motley, hereby moves for this Court to admit Michael R. Hoernlein to practice *pro hac vice* in the above-captioned matter. In support of this motion, counsel respectfully represents the following:

1. Mr. Hoernlein has specialized knowledge of the facts of this case.
2. Mr. Hoernlein is not a member of the bar of this Court and is not licensed to practice in the Commonwealth of Virginia.
3. Mr. Hoernlein is licensed to practice and a member of good standing of the Bars of New York (Bar No. 4064606) and North Carolina (Bar No. 40419) and is admitted to the following courts:

State Courts of New York

State Courts of North Carolina

U.S. District Court Eastern District of New York

U.S. District Court Southern District of New York

U.S. District Court Western District of North Carolina

U.S. District Court Eastern District of North Carolina

U.S. District Court Middle District of North Carolina

U.S. Court of Appeals for the Fourth Circuit

U.S. Supreme Court

4. Mr. Hoernlein is of good character and standing and has the requisite experience and professionalism to appear before this Court.

WHEREFORE, counsel respectfully requests the Court admit Michael R. Hoernlein *pro hac vice* to practice before this Court solely in the above-captioned matter. Counsel also moves that the Court exercise its discretion to allow Mr. Hoernlein to “appear at hearings or trials in the absence of an associated member” pursuant to Local Rule 6(d).

Respectfully submitted this 7th day of October 2022.

/s/ Thomas W. Davison

Thomas W. Davison (Va. Bar No. 94387)

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Counsel for Defendant Kimberly Motley

CERTIFICATE OF SERVICE

I certify that on October 7, 2022, I filed this Motion for Admission *Pro Hac Vice* of Michael R. Hoernlein using the Court's CM/ECF system, which will provide service to all counsel of record.

/s/ Thomas W. Davison

Thomas W. Davison

Counsel for Defendant Kimberly Motley